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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAS VEGAS REGIONAL SURGERY
CENTER, L.P., a Nevada limited partnership,

Plaintiff,

vs.

BLUE CROSS OF COLORADO, a business
organization, form unknown, and DOES 1–10,

Defendants.

2:18-CV-00093-RFB-(NJK)

*Stipulation and Order to Extend Time to File
Response to Defendant's Motion to Dismiss
Plaintiff's Complaint Pursuant to F.R.C.P.
Rule 12(b)(6)
(First Request)*

In accordance with LR IA 6-1, LR 7-1(a), and 7-2, the parties stipulate as follows:

1. On February 22, 2018, Rocky Mountain Hospital and Medical Service, Inc. doing business as Anthem Blue Cross and Blue Shield, erroneously named as Blue Cross of Colorado, filed Defendant's Notice of Motion and Motion to Dismiss Plaintiff's Complaint Pursuant to F.R.C.P. Rule 12(b)(6) (ECF No. 12). In accordance with LR 7-2(b), the plaintiff, Las Vegas Regional Surgery Center, L.P., has up to and including March 8, 2018, to file a response to the motion.

2. Counsel for Las Vegas Regional Surgery Center serves on the board of directors of a local non-profit organization. The non-profit's large annual event occurred on March 2 through March 4. Counsel was in charge of running the event, which involved a substantial amount of time before, during, and after the event.

1 3. Hence, Las Vegas Regional Surgery Center's counsel asked for and
2 Blue Cross's counsel agreed to grant the Las Vegas Regional Surgery Center an
3 extension of time until March 19, 2018, to file its response to the motion to dismiss.

4 4. Accordingly, the parties stipulate that Las Vegas Regional Surgery
5 Center shall have up to and including March 19, 2018, to file a response to the
6 motion. In accordance with LR 7-2, Blue Cross may file a reply in support of the
7 motion on or before March 26, 2018.

8 5. This is the first request for an extension of time to file an opposition to
9 the motion to dismiss.

10 DATED this 7th day of March 2018.

11 DAVID J. MERRILL, P.C.

 MESERVE MUMPER & HUGHES LLP

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13 By: /s/ David J. Merrill
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 Attorney for Plaintiff

 By: /s/ Anna Maria Martin
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 Attorneys for Defendant

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20 IT IS SO ORDERED:

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 RICHARD F. BOULWARE, II
 United States District Judge

23 DATED this 12th day of March, 2018.
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